

Version: 1.2

Data: Feb.7, 2014

510(k) SUMMARY

[As required by 21CFR 807.92]

FEB - 7 2014

FDES106(ED406) Series Electro-Stimulator, K (130723)

1. Submitter's Information [21CFR 807.92(a)(1)]

Company Name:

Famidoc Technology Co., Ltd

Street Address:

No. 212 Yilong Road, Hexi Industrial Zone, Jingxia, Changan

Town

City:

Dongguan

State/ Province:

Guangdong

Country:

China

Telephone:

+86(769) 89272488-8674

Fax:

+86(769) 89272498

Contact Person:

Reanny Wang

Contact Title:

Vice-general Manager

Contact Email:

qa@famidoc.com

2. Trade Name, Common Name, Classification [21CFR 807.92(a)(2)]

a) Trade Name:

FDES106(ED406) Mini TENS&EMS Device

FDES106A(ED406A) Multi-function TENS&EMS Device

Common Name:

Electro-Stimulator or Electrical Stimulator

Classification Name:

Stimulator, Muscle, Powered, for muscle conditioning

per 21 CFR § 890.5850;

Transcutaneous Electrical Nerve Stimulator for Pain Relief;

Stimulator, Nerve, Transcutaneous, Over-the-Counter

per 21 CFR § 882.5890

Device Class:

Class II

Product Code:

NUH, NGX

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b) Trade Name:

FDES105(ED405) Pain Relief Plaster

Common Name:

TENS or TENS Device

Classification Name:

Transcutaneous Electrical Nerve Stimulator for Pain Relief;

Stimulator, Nerve, Transcutaneous, Over-the-Counter

per 21 CFR § 882.5890

Device Class:

Class II

Product Code:

NUH

c) Trade Name:

FDES107(ED407) Abdominal Fitness Belt

Common Name:

Powered Muscle Stimulator, OTC

Classification Name: Stimulator, Muscle, Powered, for muscle conditioning

per 21 CFR § 890.5850;

Device Class:

Class II

Product Code:

NGX

3. Identification of Predicate Device(s)[21 CFR 807.92(a)(3)]

	PREDICATE DEVICES	
Manufacturer	Endurance Therapeutics	Bio-Medical Research
Manuideluiei	Lituarance merapeutics	Ltd
		Slenderton FLEX
Legally Marketed Device	T1040 [™]	Abdominal Training
		system type 515
510 (K) Number	K060846	K030708

Description of Device[21 CFR 807.92(a)(4)]

The FDES106(ED406) Series Stimulator, which includes models FDES106(ED406), FDES106A(ED406A), FDES105(ED405) and FDES107(ED407), are Transcutaneous Electrical Nerve Stimulator and muscle stimulator for pain relief and/or Electrical Muscle Stimulator. The stimulator sends gentle electrical current to underlying nerves and muscle group via electrodes applied on the skin. The parameters of units are controlled by the press buttons. Its intensity level is adjustable according to the needs of patients.



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The device unit of FDES106(ED406) and FDES106A(ED406A) are same, only the applied part are different: the applied part of FDES106(ED406) is <u>electrode pad</u>; the applied part of FDES106A(ED406A) is <u>electrode belt</u>. They are portable device, battery powered (3.0V DC) multi-function device offering both Transcutaneous Electrical Nerve Stimulator (TENS) and Powered Muscle Stimulator (EMS) qualities in one device.

The FDES106 (ED406) includes FDES105 (ED405). FDES106 (ED406) has TENS and EMS two treatment mode 5 programs (N, B, H, E1, E2), FDES105 (ED405) only has TENS mode 5 treatment programs (N1, N2, B, H, F). Their appearance, structure, circuit, software operation is exactly the same, only different output treatment procedure.

FDES107 (ED407) has 10 EMS treatment process, whose intended use, waveform characteristics and is basically the same as FDES106 (ED406) EMS model, The difference is from only operation mode and structure appearance.

Independent channel (by electrode pad or electrode belt) that effectively transfers your desired choice of pre-programmed electrical pulses directly through electrode (electrode pad or electrode belt) to suggested area of the body where the electrode are placed, causing minimal muscle contractions. The FDES106 (ED406) and FDES106A (ED406A) have 3 TENS programs and 2 EMS programs; FDES105 (ED405) have 5 TENS programs; FDES107 (ED107) have 10 EMS programs.

5. Intended Use[21 CFR 807.92(a)(5)] FDES106(ED406) Mini TENS &EMS Device

For program N, B and H of TENS mode

To be used for temporary relief of pain associated with sore and aching muscles due to strain from exercise or normal household work activities.

For program E1 and E2 of EMS mode

Used to stimulate healthy muscles in order to improve and facilitate muscle performance.

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FDES106A(ED406A) Multi-function Mini TENS &EMS Device

For program N, B and H of TENS mode

To be used for temporary relief of pain associated with sore and aching muscles in the lower back, abdomen, thigh and arm due to strain from exercise or normal household work activities.

For program E1 and E2 of EMS mode

Used to stimulate healthy muscles in the lower back, abdomen, thigh and arm in order to improve and facilitate muscle performance.

FDES105(ED405) Pain Relief Plaster

To be used for temporary relief of pain associated with sore and aching muscles due to strain from exercise or normal household work activities.

FDES107(ED407) Abdominal Fitness Belt

Used to stimulate healthy muscles in order to improve and facilitate muscle performance for abdominal.

6. Discussion of Non-Clinical Tests Performed for Determination of Substantial Equivalence are as follows: [21 CFR 807.92(a)(6)]

The FDES106(ED406) Series Electro-Stimulator did not conduct, nor rely upon, clinical tests to determine substantial equivalence. Nonclinical testing was performed in order to validate the design according with the company's specified design requirements, and to assure conformance with the following voluntary design standards:

- IEC 60601-1, Medical electrical equipment Part 1: General requirements for safety".
- IEC 60601-1-2, Medical electrical equipment Part 1-2: General requirements for basic safety and essential performance – Collateral Standard: Electromagnetic compatibility- Requirements and tests, Interpretation Sheet."
- IEC 60601-1-11, Medical electrical equipment Part 1-11: General Requirements for basic safety and essential performance - Collateral Standard: Requirements for



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medical electrical equipment and medical electrical systems used in the home healthcare environment.

- ➤ IEC 60601-1-4, Medical electrical equipment Part 1-4: General requirements for safety – Collateral standard: Programmable electrical medical systems
- IEC 60601-2-10, Medical electrical equipment Part 2: Particular requirements for the safety of nerve and muscle stimulators
- > In addition to the compliance of voluntary standards, the software verification has been carried out according to the FDA software guidance.

7. Biocompatibility Certification for accessories [21 CFR 807.92(a)(7)]

The materials of applied part are Electrode pad and Electrode belt; the material of enclose is ABS. They are both meet the biocompatibility testing of ISO 10993-5 and ISO 10993-10 standards.

8. Comparison for Predicate Device & Subject Device [21 CFR 807.92(a)(8)]

We present the relevant information for the predicate device here for demonstrating the characteristics of the predicate device.

8.1 Comparison of significant device features



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		New	New device		Predica	Predicate device
·	9 O I V I I I I I I I I I I I I I I I I I	Multi-function	Pain			Slenderton FLEX
Comparison item	WILL I END	Mini TENS	Relief	Abdominal Fitness	T1040TM	Abdominal Training
	EMIS Device	&EMS Device	Plaster	Belt FDES107	2	system type 515
	rDES 106	FDES106A	FDES105			
510K#		Pe	Pending		K060846	K030708
		H			Endurance	Bio-Medical
Manutacturer		ramidoc Technology Co., Ltd.	nnalogy Ca.,		Therapeutics	Research Ltd
Prescription or OTC			отс		OTC	отс
FDA product code	HON	NUH, NGX	NUH	NGX	NUH, NGX	NGX
Power source	Battery pov	Battery powered, d.c. 3.0V, 2 X AAA batteries	2 X AAA	Battery pow	Battery powered, d.c. 4.5V, 3 X AAA batteries	AAA batteries
User interface	By LED light	By LED light and silk-screen indication	indication		By LCD display	
Output channel		Single	Single channel		Two	Two channels
Number of output models	TENS	TENS and EMS	TENS	EMS	TENS and PMS(EMS)	EMS
Number of treatment programs		5	5	10	10	7
Number of Synchronous or output channels Alternating?		Alte	Alternating		Alternating	Symmetrical Biphasic
Number of output channels			-		1	Dual
Method of channel isolation		By electrical circuit and software	rcuit and soft	ware	By etectrical ci	By electrical circuit and software
Constant Current or Constant Voltage?		Consta	Constant Voltage		Consta	Constant Voltage
Waveform		Biphas	Biphasic square		Bil	Biphasic
Software/Firmware/ Microprocessor Control?			Yes		:	Yes
						,



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	٠		Nev	New device		Predica	Predicate device
Š	Comparison item	Mini TENS& EMS Device FDES106	Multi-function Mini TENS &EMS Device FDES106A	Pain Relief Plaster FDES105	Abdominal Fitness Belt FDES107	Т1040 ^{ТМ}	Slenderton FLEX Abdominal Training system type 515
Automatic overload trip?	rload trip?			Yes		Unknowable	Unknowable
Automatic Ove	Automatic Over Current Trip?			Yes		Unknowable	Unknowable
Automatic No Load Trip?	Load Trip?			Yes		Yes	Yes
Automatic shut off?	t off?			Yes		Yes	Yes
Patient Override Control?	de Control?			Yes		Yes	Unknowable
Indication	On/off status?			Yes		Yes	Yes
function	Low battery?			Yes		Yes	Yes
	Voltage/ current level?		No		Yes	Yes	Yes
Time range (min)	lin)	Nonac	Nonadjustable 30 minutes	nutes	Nonadjustable, 20, 25 and 30min	Nonadjustable 15 minutes	Nonadjustable, 20, 25 & 30
Patient	- Normal condition (uA)		6.0		0.8	Unknowable	Unknowable
Leakage Current	 Single fault condition (uA) 		0.8	,	1.26	Unknowable	Unknowable
Average DC curre when device is on being applied (uA)	Average DC current through electrodes when device is on but no pulses are being applied (uA)	TENS: 0 EMS: 0 No output no pulse		TENS: 0 EMS: N/A No output no pulse applied	TENS: N/A EMS: 0 No output no pulse applied	TENS: 0 EMS: 0 No output no pulse applied	ENS: N/A EMS: 0 No output no pulse applied
Housing mater	Housing materials construction		Plastic (A	Plastic (ABS) enclosure		Plastic (AE	Plastic (ABS) enclosure



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		New device	vice		Predicate device	e device
Comparison item	Mini TENS& EMS Device FDES106	Multi-function Mini TENS &EMS Device FDES106A	Pain Relief Plaster FDES105	Abdominal Fitness Belt FDES107	T1040™	Slenderton FLEX Abdominal Training system type 515
Treatment area	For TENS mode: Low back, upper extremities(arm), Lower extremities (leg); For EMS: Any area (Except those treatment area which been described in the user manual can not use)	Arm, Waist, Buttock, Abdomen, Thigh and low back	Low back, upper extremities(arm), Lower extremities (leg);	Abdomen	For TENS mode: Low back, upper extremities(arm), Lower extremities (leg); For EMS: Any area (Except those treatment area which been described in the user manual can not use)	Abdomen
List of patient contacting material(s)	Electrode – Transparent silica gel Enclosure – ABS	Electrode belt– Silicon rubber, Cloth Enclosure – ABS	Electrode – Transparent silica gel Enclosure – ABS	Electrode belt- Silicon rubber, Cloth Enclosure - ABS	Electrode – Transparent silica gel Enclosure – ABS	Electrode belt - Transparent silica gel Enclosure - ABS
Compliance with 21 CFR 898?		Yes			Yes	Yes



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			New d	New device		Predica	Predicate device
E CO	Comparison item	Mini TENS& EMS Device FDES106	Multi-function Mini TENS &EMS Device FDES106A	Pain Relief Plaster FDES105	Abdominal Fitness Belt FDES107	T1040 TM	Slenderton FLEX Abdominal Training system type 515
	Type of protection against electric shock		Internally powe	Internally powered equipment		Internally pow	Internally powered equipment
Classification	Degree of protection against electric shock		Type BF a	Type BF applied part	,	Type BF	Type BF applied part
	Device Class		Clas	Class II		ö	Class II
	Biocompatibility	Compliant with restandards	Compliant with requirements of ISO 10993-5 and ISO 10993-10 standards	SO 10993-5 and	ISO 10993-10	Same	Same
Compliance	Mechanical Safety	Compliant with re safety standards	Compliant with requirements of IEC 60601-1, IEC 60601-2-10 safety standards	EC 60601-1, IE(C 60601-2-10	Same	Same
Voluntary	Electrical Safety	Compliant with r IEC 60601-1-2 s	Compliant with requirements of IEC 60601-1, IEC 60601-2-10, IEC 60601-1-2-10, IEC 60601-1-2 safety standards	EC 60601-1, IE(C 60601-2-10,	Same	Same
Stalldalus	Energy delivered	The delivered er	The delivered energy is limited according to requirements of collateral IEC 60601-2-10 safety standards	occording to requestandards	uirements of	Same	Same
	Other	Compliant with r	Compliant with requirements of IEC 60601-11 safety standard	EC 60601-11 sa	ifety standard	Unknowable	Unknowable
Applied part		Electrode pad	Electrode belt	Electrode pad	Abdominal electrode belt	Electrode pads	Abdominal electrode belt
Weight (lbs., oz.)	Z.)	0.093	0.093	0.093	0.18	0.19	Unknowable
Dimensions(in.) [W \times H \times D] For unit	.) [W×H×D]	2.	2.25"×1.77"×0.36"		3.62"×3.19"×0 75"	5.91"×2.68"× 1.02″	Unknowable



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		New device	levice		Predic	Predicate device
Comparison item	Mini TENS& EMS Device FDES106	Multi-function Mini TENS &EMS Device FDES106A	Pain Relief Plaster FDES105	Abdominal Fitness Belt FDES107	T1040 TM	Slenderton FLEX Abdominal Training system type 515
Operating temperature and humidity		5-40°C, 30%-85%	%-82%		Unknowable	0-35°C, 20%-65%
Storage temperature and humidity		-10-50°C, 10%-90%	10%-90%		Unknowable	0-52°C, 10%-90%

8.2 Comparison of significant output specifications:

			New device	vice		Predi	Predicate device
Compar	Comparison item	Mini TENS& EMS Device FDES106	Multi-function Mini TENS &EMS Device FDES106A	Pain Relief Plaster FDES105	Abdominal Fitness Belt FDES107	T1040 TM	Slenderton FLEX Abdominal Training system type 515
	TENS mode	Biphasic	Biphasic	Biphasic	N/A	Biphasic	N/A
vvavelorm	EMS mode	Biphasic	Biphasic	N/A	Biphasic	Biphasic	Biphasic
Change	TENS mode	Square	Square	Square	N/A	Square	N/A
Sliape	EMS mode	Square	Square	N/A	Square	Square	Square
Max Output Voltage (V)	(v)						
000	TENS mode	30.4	30.4	28	N/A	40.7	N/A
DAUL TOUC	EMS mode	28	28	N/A	46.4	40.7	47.3
7 - 7	TENS mode	44.8	44.8	36.8	N/A	105.1	N/A
ZKIZIOad	EMS mode	44.8	44.8	N/A	72	105.1	89.3



Sponsor: Famidoc Technology Co., Ltd. File No: XW-Stimulator A-FDA-07 Version: 1.2 Data: Feb.7, 2014

			New device	evice		Predi	Predicate device
Сомра	Comparison item	Mini TENS& EMS Device FDES106	Multi-function Mini TENS &EMS Device FDES106A	Pain Relief Plaster FDES105	Abdominal Fitness Belt FDES107	Т1040 ^{ТМ}	Slenderton FLEX Abdominal Training system type 515
	TENS mode	54.4	54.4	41.6	N/A	154.1	N/A
10kΩ load	EMS mode	54.4	54.4	N/A	120	154.1	91.3
Max Output Current (mA)	(mA)						•
	TENS mode	60.8	60.8	56	A/A	81.4	A/N
50012 load	EMS mode	56	99	N/A	92.8	81.4	94.7
	TENS mode	22.4	22.4	18.4	N/A	47.8	N/A
2KΩload	EMS mode	22.4	22.4	N/A	36	47.8	89.3
	TENS mode	5.4	5.4	4.2	N/A	15.4	N/A
10kΩ load	EMS mode	5.4	5.4	N/A	12	15.4	60.7
Pulse Width	TENS mode	200-250	200-250	200-250	N/A	4.1-500	A/N
Range(uS)	EMS mode	250	250	N/A	250	4.1-500	200-300
	TENS mode	2-80	7-80	2-80	N/A	245	N/A
Frequency(Hz)	EMS mode	2-50	2-50	N/A	3-80	245	45-75
Net Charge per	TENS mode	15.2	15.2	15.2	N/A	40.7	N/A
pulse cycle (uC, 500Ω)	EMS mode	14	14	N/A	23.2	40.7	28.41
Maximum Phase	TENS mode	15.2	15.2	15.2	N/A	2.71	N/A
Charge (uC, 500Ω)	EMS mode	4	41	N/A	23.2	2.71	Unknowable



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			New device	evice		Predi	Predicate device
Comparison item	tem	Mini TENS& EMS Device FDES106	Multi-function Mini TENS &EMS Device FDES106A	Pain Relief Plaster FDES105	Abdominal Fitness Belt FDES107	T1040 TM	Stenderton FLEX Abdominal Training system type 515
Maximum Current Density	TENS mode	4.1	3.4	4.1	A/N	2.71	N/A
(mA/cm², 500Ω, r.m.s)	EMS mode	3.77	3.13	N/A	1.9	2.71	Unknowable
Maximum Average	TENS mode	0.51	0.42	0.48	A/N	Unknowable	A/N
Current (average absolute value) [mA, 500Ω]	EMS mode	0.41	0.34	N/A	0.3	Unknowable	Unknowable
Maximum Power Density	TENS mode	0.124	0.103	0.105	A/N	0.099	N/A
(W/cm², 500Ω, r.m.s)	EMS mode	0.105	0.087	N/A	0.039	0.099	Unknown
Maximum Average Power Density (mW/cm²) [using	TENS mode	2	4.1	1.7	A/N	5.35	N/A
smallest electrode conductive surface area]	EMS mode	1.2	-	N/A	1.8	5.35	Unknowable
Duration of primary	TENS mode	0.25	0.25	0.25	A/N	0.5	N/A
(depolarizing) phase (ms)	EMS mode	0.25	0.25	N/A	0.25	0.5	0.3
Burst Mode (For TENS mode only)	de only)	•					
a. Pulse per burst		7	7	7	N/A	N/A	N/A
b. Bursts per second		2	2	2	N/A	N/A	N/A
c. Burst duration (ms)		0.2	0.2	0.2	N/A	N/A	N/A
d. Duty Cycle (ms)		1.4	14	1.4	N/A	N/A	N/A



Sponsor: Famidoc Technology Co., Ltd.

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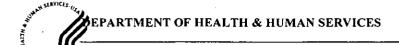
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		New device	evice		Predi	Predicate device
Comparison item	Mini TENS& EMS Device FDES106	Multi-function Mini TENS &EMS Device FDES106A	Pain Relief Plaster FDES105	Abdominal Fitness Belt FDES107	T1040 TM	Slenderton FLEX Abdominal Training system type 515
For EMS mode only					:	
On Time (S)	9	٠ <u>٠</u> ع	N/A	4-8	N/A	Unknowable
Off Time (S)	10	10	N/A	2-10	N/A	Unknowable
Ramp up time(S)	2	2	N/A	2-10	N/A	Unknowable
Ramp down time(S)	2	2	N/A	0-12	N/A	Unknowable

. Conclusions

same intended use and technological characteristics and the similar technological characteristics as the predicate device T1040 (K060846) The FDES106(ED406) Series Stimulator, which includes models FDES105(ED405), FDES106A(ED406A) and FDES107(ED407), has the documentation supplied in this submission demonstrates that the difference in the submitted models could maintain the same safety and and Slendertion FLEX Abdominal Training system type 515 (K030708). Moreover, bench testing, safety report and Risk Analysis Report fundamental scientific technology of the device. Thus, the FDES106(ED406) Series Electro-Stimulator is substantially equivalent to the effectiveness as that of predicate device. In the other words, those engineering difference do not affect the intended use or alter the



Food and Drug Administration 10903 New Hampshire Avenue Document Control Center – WO66-G609 Silver Spring, MD 20993-0002

February 7, 2014

Famidoc Technology Co., Ltd. c/o Reanny Wang Vice-General Manager No. 212 Yilong Road, Hexi Industrial Zone, Jingxia, Changan Town, Dongguan 523853, Guangdong Province CHINA

Re: K130723

Trade Name: FDES106 (ED406) Series OTC Stimulator Models:

Mini TENS&EMS Device Model FDES106 (ED406),

Multi-function Mini TENS&EMS Device Model FDES106A (ED406A), Pain Relief Plaster Model FDES105 (ED405),

Abdominal Fitness Belt Model FDES107 (ED407)

Regulation Number: 21 CFR 890.5850

Regulation Name: Powered Muscle Stimulator

Regulatory Class: Class II Product Code: NGX, NUH Dated: January 7, 2014 Received: January 13, 2014

Dear Mr. Wang:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely yours,

Carlos L. Penal-S

Carlos L. Peña, PhD, MS
Director
Division of Neurological and
Physical Medicine Devices
Office of Device Evaluation
Center for Devices and Radiological Health

Enclosure

Indications for Use

510(k) Number: K130723

Device Name: FDES106 Series OTC Stimulator Models:

Mini TENS&EMS Device Model FDES106 (ED406),

Multi-function Mini TENS&EMS Device Model FDES106A (ED406A),

Pain Relief Plaster Model FDES105 (ED405), Abdominal Fitness Belt Model FDES107 (ED407),

Indications For Use:

FDES106 (ED406) Mini TENS &EMS Device

For program N1, B and H of TENS mode

To be used for temporary relief of pain associated with sore and aching muscles due to strain from exercise or normal household work activities.

For program E1 and E2 of EMS mode

Used to stimulate healthy muscles in order to improve and facilitate muscle performance.

FDES106A (ED406A) Multi-function Mini TENS &EMS Device

For program N1, B and H of TENS mode

To be used for temporary relief of pain associated with sore and aching muscles in the lower back, abdomen, thigh, and arm due to strain from exercise or normal household work activities.

For program E1 and E2 of EMS mode

Used to stimulate healthy muscles in the lower back, abdomen, thigh, and arm in order to improve and facilitate muscle performance.

FDES105 (ED405) Pain Relief Plaster

To be used for temporary relief of pain associated with sore and aching muscles due to strain from exercise or normal household work activities.

FDES107 (ED407) Abdominal Fitness Belt

Used to stimulate healthy muscles in order to improve and facilitate muscle performance for abdominal.

Prescription Use _____ AND/OR Over-The-Counter Use __X (21 CFR 801 Subpart D) (21 CFR 801 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of Center for Devices and Radiological Health (CDRH)

Carlos L. Pena -S